

Thus far I have withheld comment on this issue. The most recent extension of the comment period has prompted me to submit to the Commission a general response to the many comments you have received thus far. The issues can be simplified by asking two simple questions. Who will benefit from low-power FM service? Who will be adversely impacted by low-power FM service? I believe small town residents will greatly benefit from the creation of a "village radio" service class. I believe only those who have huge investments in large broadcasting operations will suffer from the creation of the low power services. The Commission only need decide if they are entrusted to protect the interests of the people or of the broadcasting corporations.

I live in Murphy, a small community on the outskirts of Dallas, TX. In the past three years our population has grown from less than 3,000 to over 7,000, yet we have less than a dozen businesses in town. No Murphy business could possibly afford even a brief bit of primetime advertising on any local station, let alone a remote broadcast event. Access to large station broadcast advertising is price prohibitive for small town businesses.

The current, full power broadcasting stations in the Dallas area take little notice of the unique needs of Murphy residents. The town simply represents too small a market share to concern the large broadcasting corporations. We do not represent a sufficient portion of the Dallas area population to warrant coverage by the local broadcasters. Murphy is just one of the many Dallas area communities that receive only passing mention during the average broadcast week. I am certain North Texas is not the only area of the country where a similar problem exists.

Consider for example an incident which occurred last year. A pump failure caused the pressure in our community water supply to drop low enough to require residents to boil water before use. Many of us were unaware of the health warning until after the water department posted "garage sale" style signs at street corners announcing the warning had been lifted. If there had been a community radio station in Murphy, we would have received the notice in a timely manner. However, the community is too small to support it's own full-power broadcasting station. Murphy and similar communities need a village-sized radio station dedicated to issues and topics unique to their town. The proposed LP100 service is exactly what we need.

Large commercial broadcasters require huge profits to keep their stations on the air and to feed dividends to their stockholders. That is their purpose in life and I would not desire to deny them the ability to succeed in their endeavors. Over the next few years, the wisest of these corporations will spend millions to fund a shift to Internet based broadcasting. Their programming will become less and less community oriented, targeting instead to the widest possible audience. Ultimately, their use of the airwaves will be a small portion of their revenue generating activities. I believe there is little chance of Murphy's water problems being noteworthy in the grand scheme of global Internet commercial broadcasts of the future.

Non-profit and member-supported broadcasting corporations differ only in the products sold and methods used. Religious oriented stations desire to spread their particular ideology to the masses. This is a worthwhile use of the airwaves and it would be a lesser world without them. However, I believe the corner church with a small membership can do a better job of reaching out to the homebound believers and unchurched in their community. This is the perfect application for the proposed LP100 and sub 10-watt services. In the

absence of excessive regulation, even the smallest community church could afford to establish and operate a low-power FM station.

Member-supported stations have developed a reputation for being little more than broadcast portals for various political agendas. One only needs to review job ads for positions at these stations to discover the obvious political nature of their purpose. I personally believe this is a perversion of the intent behind the Commissions' rules supporting non-profit broadcasting. The few member-supported stations that are not politically motivated succeed because they service the needs of their communities. Low-power FM will not harm these stations. They are instead the models on which successful low-power FM stations will be built.

I have no desire for the large broadcasting corporations to loose market share. And I would not like to see the non-profit stations loose their badly needed members. But both of these institutions are about revenue, not public service. I have faith the Commission will take this into consideration as they weigh the facts and opinions placed before them.

One final response to the comments concerning the status of those who have operated or continue to operate illegal broadcast stations at any power level. I do not believe the public interest will be served by giving preferential treatment to these individuals. They, and many others, have done a great service by bringing the low-power FM debate to the public forum. However, the same result could have been achieved through legal means if they had chosen to work within the system. Their penchant for subverting the Commissions' established rulemaking processes should not be rewarded. In the same vein, past behavior should not automatically disqualify them from operating legally licensed stations under existing or proposed rules.

I offer an analogy. Someone who exceeds the speed limit should be fined thereby suffering the consequences of their actions. Exceeding the speed limit with the intent of forcing the limit to be increased is a ridiculous idea. The fact the limit is eventually raised should have no effect on prior violations. Fairness demands that a single violation should not require revocation of driving privileges for life. However, repeated violations are an indication the individual lacks the necessary respect for established rules of behavior and should have all driving privileges revoked. This is the foundation of fairness on which our society is built, be it traffic laws or FCC regulations.

Thank you for this opportunity to voice my concerns on this matter.

Sincerely,

Richard L. Buckmaster